

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO:  ETHICON WAVE 13 CASES LISTED IN EXHIBIT A</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**DEFENDANTS' MOTION TO EXCLUDE THE  
GENERAL OPINIONS AND TESTIMONY OF STACEY WALLACH, M.D.**

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Defendants Ethicon, Inc. and Johnson & Johnson (collectively, "Ethicon") hereby move to exclude certain general testimony and opinions offered by Plaintiffs' retained expert, Stacey Wallach, M.D. As set forth more fully in Ethicon's supporting memorandum, certain of Dr. Wallach's general opinions are inadmissible under the standards set forth in Federal Rule of Evidence 702 and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and its progeny, and the Court should preclude Dr. Wallach from offering these opinions at trial.

In support of this motion, Ethicon incorporates its Memorandum in Support of Defendants' Motion to Exclude the General Opinions and Testimony of Stacey Wallach, M.D., as well as the following exhibits:

<b>EXHIBIT</b>	<b>DESCRIPTION</b>
A	List of Relevant Cases;
B	Wave 13 Plaintiffs' General Expert Witness Disclosure;
C	Larson Plaintiffs' Rule 26 Expert Disclosures; and
D	Case-Specific Expert Report of Stacey Wallach, M.D. (redacted).

FOR THESE REASONS, and as more fully set forth in Ethicon's supporting memorandum, Ethicon respectfully requests that this Court enter an order granting Defendants' Motion to Exclude the General Opinions and Testimony of Stacey Wallach, M.D., and limiting Dr. Wallach's opinions as set forth therein.

Respectfully submitted,

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INC. AND JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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